

Vann v. City of Rochester, et al
18-cv-06464

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COR VANN 033036 - COR VANN 033100	Pagan PDS	8/17/2023	Plaintiff's First RFP, ¶¶ 54 and 55
COR VANN 033101 - COR VANN 033317	Zimmerman PDS	8/17/2023	Plaintiff's First RFP, ¶¶ 54 and 55
COR VANN 03318 - COR VANN 033331	Laiosa PDS	8/17/2023	Plaintiff's First RFP, ¶¶ 54 and 55
COR VANN 03332 – COR VANN 033342	Jalen Everett Claim	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 033343 – COR 033345	D'Kuan Webb Claim	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 033346 – COR VANN 033349	Kaw Khu Htoo Claim	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 033350 – COR VANN 033356	Carolyn Irby Claim	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 033357	Stanislav Smirnov Claim	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 033358 – COR VANN 033366	ROC Love Will End Abortion Claim	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 033367 – COR VANN 033389	Rickey Bryant, Jr. Claim	8/17/2023	Plaintiff's First RFP, ¶ 56

COR VANN 033390 – COR VANN 033395	Rickey Bryant Closing Docs	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 033396 – COR VANN 033404	Daniel Willie Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 0033405	Daniel Willie Closing Docs	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 0033406 - COR VANN 033455	Robert Forbes Amended Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 033456 - COR VANN 033479	Robert Forbes Amended Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 033480 - COR VANN 033635	Hall Class Action Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 033636 - COR VANN 033662	Ivery Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 033663	Dwayne Ivery Judgment	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 033664 - COR VANN 033700	Dwayne IVery Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 033701 - COR VANN 033713	Tyquan Johnson Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 033714 - COR VANN 033715	Tyquan Johnson closing docs	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 033716 - COR VANN 33771	Shannon Jones Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 33772	Shannon Jones Judgment in Favor of Defendants	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 033773 - COR VANN 033844	Quintin Keene Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 033845 - COR VANN 033847	Quintin Keen Closing Docs	8/17/2023	Plaintiff's First RFP, ¶ 56

COR VANN 033848 – COR VANN 033858	Desean Kelly Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 033859	Desean Kelly Judgment in Favor of Defendants	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 033860 - COR VANN 33892	James Dean Kendrick Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 033893 - COR VANN 033895	Jarvis Kodell Lewis, Sr. Decision and Order	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 033896 - COR VANN 033909	Jarvis Kodell Lewis Summons and Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 0033910 - COR VANN 033973	Delmar Lipford Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 033974 - COR VANN 033976	Delmar Lipford Closing Documents	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 033977 - COR VANN 033992	Lucas Brandon Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 033993 - COR VANN 034021	McFarland (Prude) Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 034022 - COR VANN 034024	McFarland (Prude) Closings Docs	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 034025 – COR VANN 034027	Brian Norford Closing Docs	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 034028 - COR VANN 034042	Brian Norford Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 034043 - COR VANN 034057	Quintin Nowlin Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 034058 - COR VANN 034060	Raliek Redd Closing Docs	8/17/2023	Plaintiff's First RFP, ¶ 56

COR VANN 034061 - COR VANN 034101	Ralieck Redd Summons and Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 034102 - COR VANN 034103	Luther Sanders Closing Documents	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 034104 - COR VANN 034112	Luther Sanders Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 034113 - COR VANN 034144	Melinda Santos Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 034145 - COR VANN 034148	Melinda Santos Closing Documents	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 034149 – 034169	Dudley Scott Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 034170 – 034172	Dudley Scott Closing Documents	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 034173 - COR VANN 034183	Michael Scott Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 034184 - COR VANN 034249	Septimus Scott Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 034250 - COR VANN 034252	Septimus Scott Closing Docs	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 034253 - COR VANN 034256	James Shorr Closing Docs	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 034257 - COR VANN 034285	James Shorr Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 034286 - COR VANN 034335	Short (Tyshon Jones) Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 034336 - COR VANN 034364	Silvon Simmons Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 034365 - COR VANN 034377	Jonathan Solomon Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56

COR VANN 034378 - COR VANN 034395	Jonathan Solomon Decision and Order Dismissing Case	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 034936 - COR VANN 034532	Vann Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 034533 - COR VANN 034563	Benny Warr Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 034564	Benny Warr Judgment	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 034565 - COR VANN 034580	Travis Welch Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 034581	Travis Welch Judgment (No Cause)	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 034582 - COR VANN 034591	Darnell Williams Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 034592 - COR VANN 034594	Darnell Williams Closing Docs	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 034595 - COR VANN 034611	Marlin Williams Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 034612	Marlin Williams Decision and Order (No Cause)	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 034613 - COR VANN 034635	Roxanne Williams (Hayden Blackman) Complaint	8/17/2023	Plaintiff's First RFP, ¶ 56
COR VANN 034636 - COR VANN 034640	Roxanne Williams (Hayden Blackman) Closing Docs	8/17/2023	Plaintiff's First RFP, ¶ 56
No Bates Stamp	Excel Spreadsheet of arrests (by certain type) for	8/17/2023	Plaintiff's First RFP, ¶ 59

	each named and additional officer		
COR VANN 039445 - COR VANN 039467	Rickey Bryant Complaint	8/17/2023	Plaintiff's First RFP, ¶ 62
COR VANN 039468 - COR VANN 039473	Rickey Bryant Closing Docs	8/17/2023	Plaintiff's First RFP, ¶ 62
COR VANN 039474 - COR VANN 039500	Dwayne Ivery Complaint	8/17/2023	Plaintiff's First RFP, ¶ 62
COR VANN 039501	Dwayne Ivery Judgment	8/17/2023	Plaintiff's First RFP, ¶ 62
COR VANN 039502 - COR VANN 039573	Quintin Keene Complaint	8/17/2023	Plaintiff's First RFP, ¶ 62
COR VANN 039574 - COR VANN 039576	Quintin Keene Settlement Docs	8/17/2023	Plaintiff's First RFP, ¶ 62
COR VANN 039577 - COR VANN 039581	Cardell Libett Claim	8/17/2023	Plaintiff's First RFP, ¶ 62
COR VANN 039582 - COR VANN 039590	Cardell Libett Complaint	8/17/2023	Plaintiff's First RFP, ¶ 62
COR VANN 039591	Cardell Libett Closing Docs	8/17/2023	Plaintiff's First RFP, ¶ 62
COR VANN 039592 - COR VANN 039655	Delmar Lipford Complaint	8/17/2023	Plaintiff's First RFP, ¶ 62
COR VANN 039656 - COR VANN 039659	Delmar Lipford Closing Docs	8/17/2023	Plaintiff's First RFP, ¶ 62
COR VANN 039660 - COR VANN 039666	Maddox Complaint	8/17/2023	Plaintiff's First RFP, ¶ 62
COR VANN 039667 - COR VANN 039674	Maddox Closing Docs	8/17/2023	Plaintiff's First RFP, ¶ 62
COR VANN 039675 - COR VANN 039677	Brian Norford Closing Docs	8/17/2023	Plaintiff's First RFP, ¶ 62
COR VANN 039678 - COR VANN 039692	Brian Norford Complaint	8/17/2023	Plaintiff's First RFP, ¶ 62

COR VANN 039693 - COR VANN 039708	Lentorya Parker Complaint	8/17/2023	Plaintiff's First RFP, ¶ 62
COR VANN 039709 - COR VANN 039711	Lentorya Parker Closing Docs	8/17/2023	Plaintiff's First RFP, ¶ 62
COR VANN 039712 - COR VANN 039752	Christopher Pate Complaint	8/17/2023	Plaintiff's First RFP, ¶ 62
COR VANN 039753 - COR VANN 039755	Ralieck Redd Closing Docs	8/17/2023	Plaintiff's First RFP, ¶ 62
COR VANN 039756 - COR VANN 039796	Ralieck Redd Complaint	8/17/2023	Plaintiff's First RFP, ¶ 62
COR VANN 039797 - COR VANN 039806	Robin Turner Claim	8/17/2023	Plaintiff's First RFP, ¶ 62
COR VANN 039807 - COR VANN 039837	Benny Warr Complaint	8/17/2023	Plaintiff's First RFP, ¶ 62
COR VANN 039838	Benny Warr Judgment	8/17/2023	Plaintiff's First RFP, ¶ 62
COR VANN 039839 - COR VANN 039841	D'Kuan Webb Claim	8/17/2023	Plaintiff's First RFP, ¶ 62
COR VANN 0039842 - COR VANN 039843	D'Kuan Webb Closing Docs	8/17/2023	Plaintiff's First RFP, ¶ 62
COR VANN 039844 - COR VANN 039866	Roxanne Williams (Hayden Blackman) Complaint	8/17/2023	Plaintiff's First RFP, ¶ 62
COR VANN 039867 - COR VANN 039871	Roxanne Williams (Hayden Blackman) Closing Docs	8/17/2023	Plaintiff's First RFP, ¶ 62
COR VANN 039872 - COR VANN 042827	Benny Warr Deposition and Trial Transcripts	8/17/2023	Plaintiff's First RFP, ¶ 72
COR VANN 042828 - COR VANN 043073	PSS 14-0243	8/17/2023	Plaintiff's First RFP, ¶¶ 74 and 75

COR VANN 043074 - COR VANN 043477	PSS 14-0762	8/17/2023	Plaintiff's First RFP, ¶¶ 74 and 75
COR VANN 043478 - COR VANN 044293	PSS 15-0299	8/17/2023	Plaintiff's First RFP, ¶¶ 74 and 75
COR VANN 044294 - COR VANN 044500	PSS 16-0628	8/17/2023	Plaintiff's First RFP, ¶¶ 74 and 75
COR VANN 044501 - COR VANN 045272	PSS 16-0679	8/17/2023	Plaintiff's First RFP, ¶¶ 74 and 75
COR VANN 045273 - COR VANN 0455606	PSS 17-0504	8/17/2023	Plaintiff's First RFP, ¶¶ 74 and 75
NO BATES	Audio/Video files for 14-0762, 15- 0132, 16-0628, 16-0679	8/17/2023	Plaintiff's First RFP, ¶¶ 74 and 75
COR VANN 0455607 - COR VANN 046406	PSS 15-0805	8/17/2023	Plaintiff's First RFP, ¶ 76
COR VANN 046407 - COR VANN 046689	PSS 16-0244	8/17/2023	Plaintiff's First RFP, ¶ 76
COR VANN 046690 - COR VANN 047208	PSS 16-0327	8/17/2023	Plaintiff's First RFP, ¶ 76
COR VANN 047209 - COR VANN 047368	PSS 16-0556	8/17/2023	Plaintiff's First RFP, ¶ 76
COR VANN 047369 - COR VANN 047573	PSS 17-0650	8/17/2023	Plaintiff's First RFP, ¶ 76
COR VANN 047574 - COR VANN 047911	PSS 17-0776	8/17/2023	Plaintiff's First RFP, ¶ 76
COR VANN 047912 - COR VANN 047931	PSS 17-0846	8/17/2023	Plaintiff's First RFP, ¶ 76
COR VANN 047932 - COR VANN 048055	PSS 17-1006	8/17/2023	Plaintiff's First RFP, ¶ 76
COR VANN 048056 - COR VANN 048134	PSS 17-1080	8/17/2023	Plaintiff's First RFP, ¶ 76

COR VANN 048135 - COR VANN 048555	PSS 17-1095	8/17/2023	Plaintiff's First RFP, ¶ 76
COR VANN 048556 - COR VANN 048756	PSS 17-1114	8/17/2023	Plaintiff's First RFP, ¶ 76
COR VANN 048757 - COR VANN 049455	PSS 17-1159	8/17/2023	Plaintiff's First RFP, ¶ 76
COR VANN 049456 - COR VANN 049881	PSS 17-1166	8/17/2023	Plaintiff's First RFP, ¶ 76
COR VANN 049882 - COR VANN 049891	PSS 18-0088	8/17/2023	Plaintiff's First RFP, ¶ 76
COR VANN 094892 - COR VANN 049913	PSS 18-0244	8/17/2023	Plaintiff's First RFP, ¶ 76
COR VANN 049914 - COR VANN 049918	PSS 18-0245	8/17/2023	Plaintiff's First RFP, ¶ 76
COR VANN 049919 - COR VANN 049931	PSS 18-0246	8/17/2023	Plaintiff's First RFP, ¶ 76
COR VANN 049932 - COR VANN 050031	PSS 18-0287	8/17/2023	Plaintiff's First RFP, ¶ 76
COR VANN 050032 - COR VANN 050053	PSS 18-0412	8/17/2023	Plaintiff's First RFP, ¶ 76
COR VANN 050054	PSS 18-0797	8/17/2023	Plaintiff's First RFP, ¶ 76
No Bates	Audio Video for 16-0244, 16- 0327, 17-0776, 17-1114, 17- 1159, 18-0412, 08-0827	8/17/2023	Plaintiff's First RFP, ¶ 76
COR VANN 050055 - COR VANN 050191	PSS 17-0252	8/17/2023	Plaintiff's First RFP, ¶ 78
COR VANN 050192 - COR VANN 050677	PSS 18-0128	8/17/2023	Plaintiff's First RFP, ¶ 78

COR VANN 050678 - COR VANN 050794	PSS 18-0287	8/17/2023	Plaintiff's First RFP, ¶ 78
COR VANN 050795 - COR VANN 051014	PSS 18-0723	8/17/2023	Plaintiff's First RFP, ¶ 78
No Bates Stamp	Audio/ Video for 18-0128 and 18- 0723	8/17/2023	Plaintiff's First RFP, ¶ 78
COR VANN 051015 - COR VANN 051027	PSS 22-0156	8/17/2023	Plaintiff's First RFP, ¶ 79
COR VANN 051028 - COR VANN 051050	PSS 23-0036	8/17/2023	Plaintiff's First RFP, ¶ 79
COR VANN 051051 - COR VANN 051058	Shemiyah Gause Claim	8/17/2023	Plaintiff's First RFP, ¶ 82
COR VANN 051059 - COR VANN 051071	Darin Proctor	8/17/2023	Plaintiff's First RFP, ¶ 82
COR VANN 051072 – COR VANN 051738	Retention Polices	8/17/2023	Plaintiff's First RFP, ¶ 120
COR VANN 051739 – COR VANN 051795	Additional RPD Interactions with Vann	8/17/2023	Plaintiff's First RFP, ¶ 12
COR VANN 051739 – COR VANN 051833 (accidentally duplicated some bates numbers)	Training: Mental Health/ Mental Hygiene/ MHA Arrests	8/17/2023	Plaintiff's First RFP, ¶ 95
COR VANN 051834 – COR VANN 052569	Training: Defensive Training Manuals	8/17/2023	Plaintiff's First RFP, ¶ 96
COR VANN 052570 – COR VANN 053151	Training: Aerosol	8/17/2023	Plaintiff's First RFP, ¶ 97
COR VANN 053152 – COR VANN 053166	Training: Report Writing, Depositions	8/17/2023	Plaintiff's First RFP, ¶ 98
COR VANN 053167 – COR VANN 053186	Training: Police Crime Scene	8/17/2023	Plaintiff's First RFP, ¶ 99

	and Evidence Specialist Court		
COR VANN 053187 – COR VANN 053218	Training: BWC Manual	8/17/2023	Plaintiff's First RFP, ¶ 101
COR VANN 053219 – COR VANN 053232	Training: GO 457 – Technician, Evidence, & Photography Reports	8/17/2023	Plaintiff's First RFP, ¶ 101
COR VANN 053233 – COR VANN 053248	Training: RPD Training C3 Sentinel	8/17/2023	Plaintiff's First RFP, ¶ 101
COR VANN 053249 – COR VANN 053258	Training: GO 207 – Performance Assessment and Career Development	8/17/2023	Plaintiff's First RFP, ¶ 103
COR VANN 053259 – COR VANN 053263	Training: PSS Manual	8/17/2023	Plaintiff's First RFP, ¶ 107
COR VANN 053264 – COR VANN 053267	PSS: Alert Thresholds	8/17/2023	Plaintiff's First RFP, ¶ 108

Bates	IA Number	Date Produced	Production Link	Demand
COR047409	2017-0055	1/13/2023	https://cityofrochester.sharefile.com/d-sdcb5d4e3b25540f9bbdc6e355263c016	10/10/2022 Demand, #1
COR033941	2010-1217	1/13/2023	https://cityofrochester.sharefile.com/d-saf12547f4d3a4a2497af54b28b92dc1e	10/10/2022 Demand, #2
COR034847	2012-0568	1/13/2023	https://cityofrochester.sharefile.com/d-s3e7f39bcf6d8420a83bc26774c995e42	10/10/2022 Demand, #3
COR034847	2012-0568	1/13/2023	https://cityofrochester.sharefile.com/d-s3e7f39bcf6d8420a83bc26774c995e42	10/10/2022 Demand, #4
COR051068	2019-0077	1/13/2023	https://cityofrochester.sharefile.com/d-s445c8aff144d44ab8a38ff363d553f6a	10/10/2022 Demand, #5
COR040553	2016-0229	1/13/2023	https://cityofrochester.sharefile.com/d-s4677178c3ac1468b8f52b9f34e122563	10/10/2022 Demand, #6
COR037253	2014-0243	1/13/2023	https://cityofrochester.sharefile.com/d-sdba9d757202c47218eeaeb79c99d65d7	10/10/2022 Demand, #7

COR037597	2014-0330	1/13/2023	https://cityofrochester.sharefile.com/d-s9891acbd7c524bf6b113af6d37eab996	10/10/2022 Demand, #8
COR048700	2017-1049	1/13/2023	https://cityofrochester.sharefile.com/d-se8e0fbca9e634723bd0689b6cb87b0a4	10/10/2022 Demand, #9
COR034528	2011-1157	1/13/2023	https://cityofrochester.sharefile.com/d-s7c07ed4333a44e75b1084691a763cd34	10/10/2022 Demand, #10
COR039602	2016-0221	1/13/2023	https://cityofrochester.sharefile.com/d-s1aefa0bb37c7493986037e10ead22fa7	10/10/2022 Demand, #11
COR041121	2016-0288	1/13/2023	https://cityofrochester.sharefile.com/d-sa0db615f23a54f3c9ebcdf1dec9f0d1c	10/10/2022 Demand, #12
COR041440	2016-0327	1/13/2023	https://cityofrochester.sharefile.com/d-se20e820639fc414697190a36eb9eaf14	10/10/2022 Demand, #13
COR048859	2018-0287	1/13/2023	https://cityofrochester.sharefile.com/d-sf1d5576a7d1d444792a159525e0ea126	10/10/2022 Demand, #14
COR048364	2017-0504	1/13/2023	https://cityofrochester.sharefile.com/d-s9746662b2e5e432e828ca542b85c5149	10/10/2022 Demand, #15
COR050104	2018-1083	1/13/2023	https://cityofrochester.sharefile.com/d-s62916408f6f4422c8efbf6be06b9127	10/10/2022 Demand, #16
COR045390	2016-0817	1/13/2023	https://cityofrochester.sharefile.com/d-sd814b77834d84519880a81d45ec2c175	10/10/2022 Demand, #17
COR045390	2016-0817	1/13/2023	https://cityofrochester.sharefile.com/d-sd814b77834d84519880a81d45ec2c175	10/10/2022 Demand, #18
COR048979	2018-0627	1/13/2023	https://cityofrochester.sharefile.com/d-s351da6b67ea344cc9ca2b1a418f0b561	10/10/2022 Demand, #19
COR048979	2018-0287	1/13/2023	https://cityofrochester.sharefile.com/d-sf1d5576a7d1d444792a159525e0ea126	10/10/2022 Demand, #20
COR034115	2011-0033	1/13/2023	https://cityofrochester.sharefile.com/d-seb080f141d8148ef88ce781223596d73	10/10/2022 Demand, #21
COR035129	2012-0742	1/13/2023	https://cityofrochester.sharefile.com/d-s12a53cee9ef244cbb3eeaf9683cf37e6	10/10/2022 Demand, #22
COR047709	2017-0289	1/13/2023	https://cityofrochester.sharefile.com/d-s9f232792ed5249cebc0ebeae57a33fd4	10/10/2022 Demand, #23

COR038230	2015-0132	1/13/2023	https://cityofrochester.sharefile.com/d-s2c5a1af42f0c46d4b01aa3e10cee5195	10/10/2022 Demand, #24
COR048979	2018-0627	1/13/2023	https://cityofrochester.sharefile.com/d-s351da6b67ea344cc9ca2b1a418f0b561	10/10/2022 Demand, #25
COR049774	2018-1061	1/13/2023	https://cityofrochester.sharefile.com/d-s5f961ec32fa44a66ba2432b1948c2604	10/10/2022 Demand, #26
COR041440	2016-0327	1/13/2023	https://cityofrochester.sharefile.com/d-se20e820639fc414697190a36eb9eaf14	10/10/2022 Demand, #27
	2011-0051	1/13/2023	Background Investigation - IA Pro Entry only (no physical/ electronic file exists)	10/10/2022 Demand, #28
COR034364	2011-0361	1/13/2023	https://cityofrochester.sharefile.com/d-s59672123bd4f4f9aa22a4a2c17bf7a4c	10/10/2022 Demand, #29
COR035116	2012-0715	1/13/2023	https://cityofrochester.sharefile.com/d-s96459802aabb48a2a2ae109b6875318e	10/10/2022 Demand, #30
	2013-1168	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #31
COR037911	2015-0118	1/13/2023	https://cityofrochester.sharefile.com/d-sf8c5fab268ea421aa0874f02dcc4684f	10/10/2022 Demand, #32
COR038395	2015-0267	1/13/2023	https://cityofrochester.sharefile.com/d-sd1da8cf2992d4e518fd92c048c7c2c14	10/10/2022 Demand, #33
COR038753	2015-0321	1/13/2023	https://cityofrochester.sharefile.com/d-se36796af939c4ab9bc3123a34161e204	10/10/2022 Demand, #34
COR038759	2015-0338	1/13/2023	https://cityofrochester.sharefile.com/d-s34f7685205bb436d848b96eb4147654f	10/10/2022 Demand, #35
	2015-0614	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #36
	2015-0615	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #37
	2015-0586	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #38

	2016-0096	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #39
	2016-0227	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #40
	2016-0374	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #41
	2016-0478	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #42
	2017-0033	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #43
	2017-0985	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #44
	2017-1064	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #45
	2018-0029	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #46
	2018-0094	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #47
	2018-0464	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #48
	2018-0468	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #49
	2018-0511	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #50
	2018-1005	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #51
	2018-1077	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #52
	2019-0138	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #53

	2019-0554	1/13/2023	Additional Employment Form. Purged per policy	10/10/2022 Demand, #54
	2019-0733	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #55
	2019-1046	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #56
	2020-0033	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #57
	2020-0371	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #58
	2020-1186	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #59
	2020-1422	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #60
COR052406	2020-1304	1/13/2023	https://cityofrochester.sharefile.com/d-s2ed41ee07c36436f856714d433b4a7c7	10/10/2022 Demand, #61
	2020-1497	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #62
	2021-0062	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #63
COR038406	2015-0299	1/13/2023	https://cityofrochester.sharefile.com/d-s5597453c689242839a69dd8b4b56ebd3	10/10/2022 Demand, #64
COR046175	2016-0903	1/13/2023	https://cityofrochester.sharefile.com/d-sd05a36b88735491d84bfef5691615e64	10/10/2022 Demand, #65
COR052608	2018-0440	1/13/2023	https://cityofrochester.sharefile.com/d-sc7a106dfbfec4f7fb5b21b950a979ef8	10/10/2022 Demand, #66
COR051051	2018-1189	1/13/2023	https://cityofrochester.sharefile.com/d-s3ee11b1d2fa54146acfd2fb899458f67	10/10/2022 Demand, #67
COR051586	2019-0124	1/13/2023	https://cityofrochester.sharefile.com/d-s4d41965f5e6443c6a838cdad1df3636a	10/10/2022 Demand, #68

COR044678	2016-0385	1/13/2023	https://cityofrochester.sharefile.com/d-s6cc06417661a43f79b12d3d7e0543038	10/10/2022 Demand, #69
	2011-0388	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #70
	2011-0999	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #71
	2012-0356	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #72
	2015-1038	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #73
COR035834	2013-0993	1/13/2023	https://cityofrochester.sharefile.com/d-sb080bc07d05848acafe447deefde0555	10/10/2022 Demand, #74
	2015-0288	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #75
COR047709	2017-0289	1/13/2023	https://cityofrochester.sharefile.com/d-s9f232792ed5249cebc0ebeae57a33fd4	10/10/2022 Demand, #76
	2009-0406	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #77
	2010-1101	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #78
COR033941	2010-1217	1/13/2023	https://cityofrochester.sharefile.com/d-se43ebb807b374ca7ab960ecd9a4b76c2	10/10/2022 Demand, #79
	2010-1360	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #80
	2011-0806	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #81
COR034847	2012-0568	1/13/2023	https://cityofrochester.sharefile.com/d-s3e7f39bcf6d8420a83bc26774c995e42	10/10/2022 Demand, #82
	2012-0964	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #83

	2013-0495	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #84
COR035702	2013-0641	1/13/2023	https://cityofrochester.sharefile.com/d-sb4fc93583bea4be79286ef81dce42af2	10/10/2022 Demand, #85
	2013-1153	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #86
COR038953	2015-0929	1/13/2023	https://cityofrochester.sharefile.com/d-s8b2116a32edb49caa7b24f1364a2af1f	10/10/2022 Demand, #87
COR039602	2016-0221	1/13/2023	https://cityofrochester.sharefile.com/d-s1aefa0bb37c7493986037e10ead22fa7	10/10/2022 Demand, #88
	2016-0247	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #89
	2016-0516	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #90
	2014-0677	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #91
	2016-0203	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #92
COR041121	2016-0288	1/13/2023	https://cityofrochester.sharefile.com/d-sa0db615f23a54f3c9ebcdf1dec9f0d1c	10/10/2022 Demand, #93
	2016-0315	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #94
	2016-0612	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #95
	2016-0816	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #96
COR035939	2013-1158	1/13/2023	https://cityofrochester.sharefile.com/d-s38555e3b2ca3401f95d713dc2835fb6b	10/10/2022 Demand, #97
	2013-1060	1/13/2023	Background Investigation - IA Pro Entry only (no physical/ electronic file exists)	10/10/2022 Demand, #98

COR052591	2015-0112	1/13/2023	https://cityofrochester.sharefile.com/d-s3a899336258b47fb9d5dd22fa4eaf43e	10/10/2022 Demand, #99
COR038400	2015-0281	1/13/2023	https://cityofrochester.sharefile.com/d-se4a31428fe3443e3803584f50a29e828	10/10/2022 Demand, #100
COR038745	2015-0317	1/13/2023	https://cityofrochester.sharefile.com/d-sc61c1711604449ca80ee209d7991146f	10/10/2022 Demand, #101
COR038762	2015-0361	1/13/2023	https://cityofrochester.sharefile.com/d-s9cd9b49915a844a989eef84afa0b7756	10/10/2022 Demand, #102
COR052409	2015-0363	1/13/2023	https://cityofrochester.sharefile.com/d-dd826b83bacf34102865919e6065142af	10/10/2022 Demand, #103
	2015-0473	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #104
	2015-0474	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #105
	2015-0618	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #106
	2016-0292	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #107
	2016-0328	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #108
COR028845	A16-0092	1/13/2023		10/10/2022 Demand, #109
COR041439	2016-0300	1/13/2023		10/10/2022 Demand, #110
COR028920	A16-0114	1/13/2023		10/10/2022 Demand, #111
COR045358	2016-0405	1/13/2023		10/10/2022 Demand, #112
	2016-0448	1/13/2023	Fleet MVA (unavoidable) - purged per policy	10/10/2022 Demand, #113

	2016-0488	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #114
	2016-0315	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #115
	2016-0694	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #116
	2016-0612	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #117
COR045372	2016-0692	1/13/2023		10/10/2022 Demand, #118
	2016-0715	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #119
	2016-0756	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #120
	2016-0816	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #121
	2016-1064	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #122
	2017-0034	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #123
	2017-0086	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #124
	2017-0422	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #125
	2019-0101	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #126
	2017-0645	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #127
	2017-0700	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #128

	2018-1219	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #129
COR051066	2018-1231	1/13/2023		10/10/2022 Demand, #130
COR051919	2019-0191	1/13/2023		10/10/2022 Demand, #131
COR051930	2020-0352	1/13/2023		10/10/2022 Demand, #132
	2020-0372	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #133
COR051987	2020-0562	1/13/2023		10/10/2022 Demand, #134
	2020-0552	1/13/2023	Admin Entry - IA Pro Entry only (no physical/ electronic file exists)	10/10/2022 Demand, #135
	2013-1168	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #136
COR037837	2014-0699	1/13/2023		10/10/2022 Demand, #137
	2015-0586	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #138
COR039382	2016-0187	1/13/2023		10/10/2022 Demand, #139
	2012-0567	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #140
	2017-0632	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #141
COR048859	2018-0287	1/13/2023		10/10/2022 Demand, #142
	2013-1191	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #143

	2015-0288	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #144
	2015-0931	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #145
	2016-0214	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #146
	2017-0632	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #147
	2006-0033	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #148
	2006-0791	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #149
	2008-0098	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #150
	2014-0157	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #151
COR038768	2015-0394	1/13/2023		10/10/2022 Demand, #152
	2020-0821	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #153
COR052112	2020-1234	1/13/2023		10/10/2022 Demand, #154
COR052258	2020-1263	1/13/2023		10/10/2022 Demand, #155
COR033456	2006-0209	1/13/2023		10/10/2022 Demand, #156
	NO DEMAND LISTED	1/13/2023		10/10/2022 Demand, #157
	2008-0944	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #158

	2012-0607	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #159
COR048364	2017-0054	1/13/2023		10/10/2022 Demand, #160
	2017-0181	1/13/2023		10/10/2022 Demand, #161
	2010-1101	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #162
	2010-1360	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #163
	2013-0495	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #164
	2015-0007	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #165
	2007-0162	1/13/2023	Background Investigation - IA Pro Entry only (no physical/ electronic file exists)	10/10/2022 Demand, #166
	2010-1168	1/13/2023	MVA. Purged per policy	10/10/2022 Demand, #167
COR034374	2011-1055	1/13/2023		10/10/2022 Demand, #168
COR028825	A12-0449	1/13/2023		10/10/2022 Demand, #169
	2012-1359	1/13/2023	No such file exists	10/10/2022 Demand, #170
	2010-0118	1/13/2023	Background Investigation - IA Pro Entry only (no physical/ electronic file exists)	10/10/2022 Demand, #171
COR033931	2010-0726	1/13/2023		10/10/2022 Demand, #172
COR034341	2011-0212	1/13/2023		10/10/2022 Demand, #173

COR035115	2012-0617	1/13/2023		10/10/2022 Demand, #174
COR035954	2013-1238	1/13/2023		10/10/2022 Demand, #175
COR037788	2014-0341	1/13/2023		10/10/2022 Demand, #176
NO BATES	2014-0421	1/13/2023		10/10/2022 Demand, #177
	2016-0123	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #178
	2016-0371	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #179
	2016-0410	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #180
	2016-0527	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #181
	2016-0675	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #182
	2016-0781	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #183
	2016-0782	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #184
	2016-0808	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #185
	2016-0814	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #186
COR045390	2016-0817	1/13/2023		10/10/2022 Demand, #187
	A16-0258	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #188

	2016-0884	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #189
	2016-0899	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #190
	2016-0879	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #191
	2016-0989	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #192
	2017-0113	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #193
	A17-0039	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #194
	2017-0191	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #195
	2017-0217	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #196
	2017-0355	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #197
COR047943	2017-0358	1/13/2023		10/10/2022 Demand, #198
COR028946	A17-0181	1/13/2023		10/10/2022 Demand, #199
	2017-0510	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #200
COR047946	2017-0487	1/13/2023		10/10/2022 Demand, #201
	2017-0557	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #202
	2017-0562	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #203

	2017-0571	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #204
	2017-0574	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #205
COR048688	2017-0714	1/13/2023		10/10/2022 Demand, #206
	2017-0708	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #207
COR028969	A17-0182	1/13/2023		10/10/2022 Demand, #208
COR048698	2017-0807	1/13/2023		10/10/2022 Demand, #209
	2017-0839	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #210
	2017-0953	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #211
	2017-0954	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #212
	2017-0958	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #213
	2017-0990	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #214
	2017-1002	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #215
	2017-1034	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #216
	2017-1035	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #217
	2017-1122	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #218

	2017-1179	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #219
	2018-0066	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #220
	2018-0069	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #221
	2018-0140	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #222
	2018-0216	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #223
	2018-0237	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #224
	2018-0318	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #225
COR048858	2018-0231	1/13/2023		10/10/2022 Demand, #226
	2018-0374	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #227
	2018-0292	1/13/2023	Subpoena Entry - purged per policy	10/10/2022 Demand, #228
	2018-0378	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #229
COR049692	2018-0629	1/13/2023		10/10/2022 Demand, #230
	2018-0865	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #231
	2018-0804	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #232
	2018-0830	1/13/2023	Subpoena Entry - purged per policy	10/10/2022 Demand, #233

COR050104	2018-1083	1/13/2023		10/10/2022 Demand, #234
COR051920	2019-0409	1/13/2023		10/10/2022 Demand, #235
	2019-0567	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #236
	2019-0913	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #237
	2019-1289	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #238
	2020-0298	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #239
COR051966	2020-0438	1/13/2023		10/10/2022 Demand, #240
	2020-0597	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #241
	2020-0611	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #242
	2020-0610	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #243
	2020-0609	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #244
	2020-0608	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #245
	2020-0605	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #246
	2020-1374	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #247
	2020-1401	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #248

	2009-0290	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #249
	2009-1275	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #250
	2010-0148	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #251
	2010-0714	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #252
	2014-0338	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #253
COR037798	2014-0351	1/13/2023		10/10/2022 Demand, #254
	2017-0889	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #255
	2008-0071	1/13/2023	Background Investigation - IA Pro Entry only (no physical/ electronic file exists)	10/10/2022 Demand, #256
COR034352	2011-0257	1/13/2023		10/10/2022 Demand, #257
COR0252623	2011-0674	1/13/2023		10/10/2022 Demand, #258
COR035691	2013-0411	1/13/2023		10/10/2022 Demand, #259
COR037584	2014-0264	1/13/2023		10/10/2022 Demand, #260
COR038392	2015-0135	1/13/2023		10/10/2022 Demand, #261
	2015-0395	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #262
COR038920	2015-0468	1/13/2023		10/10/2022 Demand, #263

	2015-0733	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #264
	2018-0718	1/13/2023	Admin Entry - IA Pro Entry only (no physical/ electronic file exists)	10/10/2022 Demand, #265
	2020-0285	1/13/2023	Admin Entry - IA Pro Entry only (no physical/ electronic file exists)	10/10/2022 Demand, #266
	2012-1191	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #267
COR030618	1998-0248	1/13/2023		10/10/2022 Demand, #268
COR030987	1999-0219	1/13/2023		10/10/2022 Demand, #269
COR034115	2011-0033	1/13/2023		10/10/2022 Demand, #270
	2011-0430	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #271
	2012-0286	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #272
	2017-0632	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #273
COR048859	2018-0287	1/13/2023		10/10/2022 Demand, #274
COR032521	2000-0607	1/13/2023		10/10/2022 Demand, #275
	2007-0678	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #276
COR046623	2016-0929	1/13/2023		10/10/2022 Demand, #277
	2015-0003	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #278

	2016-0408	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #279
	2016-0802	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #280
	2016-0816	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #281
COR048831	2017-1072	1/13/2023		10/10/2022 Demand, #282
	2020-0857	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #283
COR029432	1994-0548	1/13/2023		10/10/2022 Demand, #284
COR030442	1997-0761	1/13/2023		10/10/2022 Demand, #285
COR030799	1998-1282	1/13/2023		10/10/2022 Demand, #286
COR031415	1999-0625	1/13/2023		10/10/2022 Demand, #287
COR032676	2001-0318	1/13/2023		10/10/2022 Demand, #288
COR035129	2012-0742	1/13/2023		10/10/2022 Demand, #289
	2013-1287	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #290
	2014-0103	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #291
	2014-0134	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #292
COR042020	2016-0347	1/13/2023		10/10/2022 Demand, #293

	2020-1281	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #294
COR029863	1997-0546	1/13/2023		10/10/2022 Demand, #295
COR030223	1997-0566	1/13/2023		10/10/2022 Demand, #296
COR031824	1999-0979	1/13/2023		10/10/2022 Demand, #297
COR031824	1999-0987	1/13/2023		10/10/2022 Demand, #298
COR031855	2000-0028	1/13/2023		10/10/2022 Demand, #299
COR032531	2000-1123	1/13/2023		10/10/2022 Demand, #300
COR033442	2002-0828	1/13/2023		10/10/2022 Demand, #301
COR035967	2013-1289	1/13/2023		10/10/2022 Demand, #302
COR037253	2014-0243	1/13/2023		10/10/2022 Demand, #303
	2015-1039	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #304
	2016-0247	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #305
	2016-0679	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #306
COR047709	2017-0289	1/13/2023		10/10/2022 Demand, #307
	2017-0716	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #308

	1992-0406	1/13/2023	Background Investigation - IA Pro Entry only (no physical/ electronic file exists)	10/10/2022 Demand, #309
COR029419	1993-1003	1/13/2023		10/10/2022 Demand, #310
COR32512	2000-0284	1/13/2023		10/10/2022 Demand, #311
COR033924	2006-0226	1/13/2023		10/10/2022 Demand, #312
COR052414	2007-0927	1/13/2023		10/10/2022 Demand, #313
	2015-0840	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #314
	2015-1039	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #315
	2016-0052	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #316
	2016-0098	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #317
	2016-0243	1/13/2023	Admin Entry - IA Pro Entry only (no physical/ electronic file exists)	10/10/2022 Demand, #318
COR028893	A16-0107	1/13/2023		10/10/2022 Demand, #319
	2016-0416	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #320
COR045362	2016-0661	1/13/2023		10/10/2022 Demand, #321
	2016-0728	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #322
	2016-0731	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #323

	2016-0732	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #324
	2016-0735	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #325
	2016-0739	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #326
	2016-0743	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #327
	2016-0679	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #328
	2016-0960	1/13/2023	Previously provided - see COR VANN 006891 - COR VANN 027444	10/10/2022 Demand, #329
	2020-0271	1/13/2023	Admin Entry - IA Pro Entry only (no physical/ electronic file exists)	10/10/2022 Demand, #330
	2020-0351	1/13/2023	Admin Entry - IA Pro Entry only (no physical/ electronic file exists)	10/10/2022 Demand, #331
COR038923	2015-0773	1/13/2023		10/10/2022 Demand, #332
	2015-0863	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #333
	2016-0203	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #334
	2016-0315	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #335
COR044140	2016-0327	1/13/2023		10/10/2022 Demand, #336
	2016-0815	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #337
COR049774	2018-1061	1/13/2023		10/10/2022 Demand, #338

	2019-0287	1/13/2023	Notice of Potential Civil Claim	10/10/2022 Demand, #339
COR028982	1991-0272	1/13/2023		10/10/2022 Demand, #340
COR029271	1991-0983	1/13/2023		10/10/2022 Demand, #341
COR048979	1996-0188	1/13/2023		10/10/2022 Demand, #342

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

----- X

DAVID VANN,

Plaintiff,

-against-

**DEFENDANTS' RESPONSE
TO INTERROGATORIES**

18-CV-6464 (EAW)(JMP)

THE CITY OF ROCHESTER, a municipal entity, POLICE OFFICER MATTHEW DRAKE, IBM # 1956, POLICE OFFICER STEVEN MITCHELL, IBM # 2134, INVESTIGATOR JEFFREY KESTER, IBM # 2230, SERGEANT JEFFREY LAFAVE, II, IBM # 1634 POLICE OFFICER DAVID E. KEPHART, IBM # 2074, POLICE OFFICER ADAM BRODSKY, IBM # 2478, POLICE OFFICER TIMOTHY DEMPSEY, IBM # 2122, INVESTIGATOR CHRISTOPHER MUSCATO, IBM # 1331, CAPTAIN GARY MOXLEY, POLICE OFFICER ANGEL PAGAN, IBM # 2421, POLICE OFFICER CHRISTOPHER J. BARBER, IBM # 1949, SERGEANT DANIEL J. ZIMMERMAN, IBM # 295, POLICE OFFICER ERIC MCGRAW, IBM # 2131, SERGEANT JOSEPH LAIOSA, IBM # 1180, INVESTIGATOR TOMESHA ANGELO, IBM # 1665, TECHNICIAN STEPHANIE MINTZ, IBM # 2496, Police Officers "JOHN DOES 1-10" (whose names are currently unknown), and other unidentified members of the Rochester Police Department,

Defendants.

----- X

Defendant City of Rochester (hereinafter "City") answers Plaintiff's Interrogatories as follows:

General Objections

All responses are made without in any way waiving or intending to waive, but intending to preserve and preserving:

All objections to questions as to competency, relevance, materiality, privilege, scope, and admissibility of evidence for any purpose in any subsequent proceeding or the trial of this or any other action.

The right to object to the use of any of the answers or the subject matter thereof in any subsequent proceeding or the trial of this or any other action on any grounds.

The right to supplement and/or amend these answers as the Defendants' investigation, discovery and preparation for trial continues.

The Defendants object generally to each demand to the extent that it seeks discovery of:

Confidential information, except as a suitable protective order is entered;

Information subject to the attorney/client privilege, or any other privilege;

Information constituting the work product of the Defendants or their attorneys;

The Defendants object to plaintiff's interrogatories to the extent they purport to impose obligations not established by the Federal Rules of Civil Procedure or the Local Rules of Civil Procedure for the United States District Court for the Western District of New York.

Interrogatory No. 1: Between October 9, 2011 to June 30, 2016, when the Professional Standards Section received a Subject Resistance Report, what was the process for reviewing the incident?

Response: *The Professional Standards Section (hereinafter "PSS") does not review Subject Resistance Reports ("SRRs"). The SRRs are reviewed at the Section level and then forwarded to PSS. PSS is merely the repository for SRRs.*

Interrogatory No. 2: From June 30, 2016 to today, when the Professional Standards Section receives a Subject Resistance Report, what was the process for reviewing the incident?

Response: See response to Interrogatory No. 1.

Interrogatory No. 3: Between October 9, 2011 to June 30, 2016, did the Professional Standards Section ever initiate an investigation solely based on its review of a Subject Resistance Report?

Response: See response to Interrogatory No. 1.

Interrogatory No. 4: For each PSS number listed in Exhibit "A" (which are the PSS numbers listed on the SRRs produced by Charles LoFaso for the time period October 9, 2011 to June 30, 2016) identify by PSS number and date each incident that PSS investigated, and state the following:

- a) The involved officers
- b) The charges against each officer

- c) The final outcome / disposition for each charge.
- d) Whether any discipline was imposed.

Response:

The City Defendants object to this demand for the following specific reasons:

The discovery sought by this interrogatory is believed to contain over 3,500 files related to subject resistance reports (commonly known as use of force reports) from every officer on the force during the years 2011-2016. The City has provided over 49,000 pages of RPD and RPD PSS records through discovery in this case. Many of the records requested in this request would have already been turned over in the previous discovery.

See Exhibit A. It has been calculated that the documents requested in this demand would contain an additional 50,000 pages and would require a hand search of files which, if available, would be over ten years old.

The discovery sought is unreasonably cumulative and duplicative, or can be obtained from some other source that is more convenient, less burdensome or less expensive.

May 24, 2024

PATRICK BEATH
CORPORATION COUNSEL

By: /s/ John Campolieto
John Campolieto, Municipal Attorney
Attorney for Defendants
30 Church St., Room 400A
Rochester, NY 14614
(585) 428-7410
campoli@cityofrochester.gov



To: Roth & Roth, LLP.
Elliot Shields, Esq.
Attorneys for the Plaintiff
192 Lexington Avenue, Suite 802
Telephone: (212) 425-1020
eshields@rothandrothlaw.com

VERIFICATION

State of New York)
County of Monroe) ss:

I, Lt. Jason Barton, being duly sworn, deposes and says that I am a defendant in this action, that I have read the foregoing answers to interrogatories and know the contents thereof, and the same are true to my knowledge, information and belief.

Jason Barton

Sworn to before me this

____ day of _____, 2024

Notary Public

From: [Campolieto, John M.](#)
To: ["Victoria Gleason"](#); [Elliot Shields](#)
Cc: [David Roth](#); [VannDavidvCityofRochesterZ11724911@rothandrothlaw.filevineapp.com](#)
Subject: RE: 18-cv-06464-EAW-MJP Vann v. The City of Rochester et al
Date: Thursday, September 5, 2024 10:15:47 AM
Attachments: [image005.png](#)

Ms. Gleason—

I would add here that in this case we expanded the discovery request and cooperated and agreed to get Plaintiff what he needed for this specific discovery request.

I would disagree and state that inviting a new motion for sanctions is both unnecessary and puts this case back in an adversarial and contentious position when the case is winding down and the parties should be working towards trial or settlement.



John M. Campolieto

Municipal Attorney
 City of Rochester, New York - Law Department
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From: Victoria Gleason <Victoria_Gleason@nywd.uscourts.gov>
Sent: Thursday, September 5, 2024 10:07 AM
To: Elliot Shields <eshields@rothandrothlaw.com>
Cc: Campolieto, John M. <John.Campolieto@CityofRochester.Gov>; David Roth <droth@rothandrothlaw.com>; VannDavidvCityofRochesterZ11724911@rothandrothlaw.filevineapp.com
Subject: RE: 18-cv-06464-EAW-MJP Vann v. The City of Rochester et al

Mr. Shields,

I think to make the record clear, since you are now adding new arguments to Plaintiff's motion for sanctions, it would make the most sense for Judge Pedersen to deny the previously filed motion and have Plaintiff file a comprehensive motion for sanctions including the new information. The City can then respond within the time permitted by the Local Rules.

Does any party have any objection to this?

Victoria



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Law Clerk to Hon. Mark W. Pedersen
Western District of New York
Kenneth B. Keating Federal Building
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From: Elliot Shields <eshields@rothandrothlaw.com>
Sent: Wednesday, September 4, 2024 4:08 PM
To: Victoria Gleason <Victoria_Gleason@nywd.uscourts.gov>
Cc: Campolioto, John M. <John.Campolioto@CityofRochester.Gov>; David Roth <droth@rothandrothlaw.com>;
VannDavidvsCityofRochesterZ11724911@rothandrothlaw.filevineapp.com
Subject: Re: 18-cv-06464-EAW-MJP Vann v. The City of Rochester et al

CAUTION - EXTERNAL:

Dear Ms. Gleason,

Thank you for granting the parties an extension to today to provide a further update. Yesterday, the City produced a list of all PSS investigations involving allegations of excessive force.

Today, the City produced the twelve PSS files from the requested time period from 2011 to 2015. Five of the files concerned “substantiated” excessive force charges, and seven concerned “exonerated” charges.

These twelve files totaled 4,346 pages of documents.

Thus, the parties have resolved the portion of plaintiff’s motion seeking to compel production. However, In my conversation today with Mr. Campolioto, I informed him that Plaintiff cannot withdraw that portion of the motion for sanctions. Mr. Campolioto responded that the City does not believe sanctions are appropriate. We agreed that we’d both write to the Court regarding our positions with regard to sanctions.

In addition to the arguments in Plaintiff’s motion papers, there are two points that are particularly relevant regarding the sanctions. First, the City claimed in its motion that the production would be unduly burdensome, specifically because “[t]he amount of documents requested in this demand would contain more than an additional 50,000 pages and would require a hand search of files,

which, if available, would be over ten to fifteen years old." ECF 161 ¶ 17. However, the twelve files amounted to only 4,346 pages.

Second, the City made this production of relevant PSS files after Plaintiff took the Rule 30(b)(6) deposition of the witness they designated to testify about PSS investigations and disciplinary issues, thus preventing Plaintiff from questioning him about any of these files.

I am happy to file supplemental briefing on the docket if the Court prefers outlining these points.

Respectfully,

Elliot Shields (he/him)
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New York, NY 10016
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From: Victoria Gleason <Victoria_Gleason@nywd.uscourts.gov>
Date: Tuesday, September 3, 2024 at 9:52 AM
To: Elliot Shields <eshields@rothandrothlaw.com>
Cc: Campolieto, John M. <John.Campolieto@CityofRochester.Gov>, David Roth <droth@rothandrothlaw.com>, VannDavidvsCityofRochesterZ11724911@rothandrothlaw.filevineapp.com <VannDavidvsCityofRochesterZ11724911@rothandrothlaw.filevineapp.com>
Subject: RE: 18-cv-06464-EAW-MJP Vann v. The City of Rochester et al

Mr. Shields,

Thank you for the update. Judge Pedersen appreciates the parties' efforts to resolve this dispute and is fine with receiving an update tomorrow.

Victoria

Victoria S. Gleason
Law Clerk to Hon. Mark W. Pedersen



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From: Elliot Shields <eshields@rothandrothlaw.com>
Sent: Friday, August 30, 2024 10:50 AM
To: Victoria Gleason <Victoria_Gleason@nywd.uscourts.gov>
Cc: Campolioto, John M. <John.Campolioto@CityofRochester.Gov>; David Roth <droth@rothandrothlaw.com>; VannDavidvsCityofRochesterZ11724911@rothandrothlaw.filevineapp.com
Subject: Re: 18-cv-06464-EAW-MJP Vann v. The City of Rochester et al

CAUTION - EXTERNAL:

Dear Ms. Gleason,

I am writing to provide an update following a meet and confer with Mr. Campolioto yesterday regarding the plaintiff's pending motion to compel and for discovery sanctions.

As a brief background, the motion pertains to the City's objection to the plaintiff's request for all Professional Standards Section investigatory files involving allegations of excessive force by an officer from 2011 to 2015, as identified by plaintiff's review of Subject Resistance Reports (SRRs) for that time period. The City originally objected on the grounds that the request was unduly burdensome.

During our conversation, we specifically addressed the burdensomeness objection. We agreed that only a small number of the SRRs completed between 2011 and 2015 resulted in a full investigation and associated PSS file. Mr. Campolioto agreed to look further into this and to compile a list of all PSS investigations that involved allegations of excessive force by an officer for this time period, and to get back to me by next Tuesday or Wednesday.

However, I also informed Mr. Campolioto that this effort would only address the part of the motion seeking to compel the production of these files. It does not resolve the aspect of the motion requesting sanctions for the City's initial refusal to provide this discovery.

The parties request an extension until next Wednesday to provide a further update to the Court on our progress in resolving these issues.

Thank you for your attention to this matter. Please let me know if you have any questions or require additional information.

Respectfully,

Elliot Shields (he/him)
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From: Victoria Gleason <Victoria_Gleason@nywd.uscourts.gov>
Date: Tuesday, August 27, 2024 at 4:21 PM
To: Elliot Shields <eshields@rothandrothlaw.com>
Cc: Campolioto, John M. <John.Campolioto@CityofRochester.Gov>
Subject: RE: 18-cv-06464-EAW-MJP Vann v. The City of Rochester et al

You don't often get email from victoria_gleason@nywd.uscourts.gov.
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Thank you Mr. Shields. We look forward to hearing from you by the end of the week regarding the meet and confer.

Victoria



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From: Elliot Shields <eshields@rothandrothlaw.com>

Sent: Tuesday, August 27, 2024 4:18 PM

To: Campolieto, John M. <John.Campolieto@CityofRochester.Gov>; Victoria Gleason <Victoria_Gleason@nywd.uscourts.gov>

Subject: Re: 18-cv-06464-EAW-MJP Vann v. The City of Rochester et al

CAUTION - EXTERNAL:

Dear Ms. Gleason,

I'm happy to meet and confer with Mr. Campolieto – however, in short, the motion relates to a large number of files that the City has refused to produce, and I don't believe they are going to agree to produce.

I think Mr. Campolito and I can speak about that today and/or tomorrow and let the Court know if we were able to make any progress.

Thank you,

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From: Campolieto, John M. <John.Campolieto@CityofRochester.Gov>

Date: Tuesday, August 27, 2024 at 4:14 PM

To: 'Victoria Gleason' <Victoria_Gleason@nywd.uscourts.gov>, Elliot Shields <eshields@rothandrothlaw.com>

Subject: RE: 18-cv-06464-EAW-MJP Vann v. The City of Rochester et al

Victoria—

Could the Court allow the parties to meet and confer on this request? There has been a lot of activity in the City's and Mr. Shields, many, federal cases since the time of that motion.

If the Court (or the Plaintiff) does not see a need for a meet and confer, would the Court allow the City until the 7th to respond to this request as the parties have a 30(b)(6) deposition in this very case tomorrow and I am leaving for a long weekend Thursday and would like the time to respond accurately. Thank you.



John M. Campolioto

Municipal Attorney

City of Rochester, New York - Law Department

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From: Victoria Gleason <Victoria_Gleason@nywd.uscourts.gov>

Sent: Tuesday, August 27, 2024 4:05 PM

To: Elliot Shields <eshields@rothandrothlaw.com>; Campolioto, John M. <John.Campolioto@CityofRochester.Gov>

Subject: 18-cv-06464-EAW-MJP Vann v. The City of Rochester et al

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Counselors,

Before Judge Pedersen considers this motion he would like to know if any issues in it have been resolved since it was filed. Please advise.

05/20/2024	view152	First MOTION to Compel <i>responses to 1-24-2024 discovery demands</i> , First MOTION for Sanctions <i>re 1-24-2024 discovery demands</i> by David Vann. (Attachments: # 1 Memorandum in Support, # 2 Declaration, # 3 Exhibit 1 - 1-24-2024 discovery demands, # 4 Exhibit 2 - spreadsheet of PSS Nos associated with SRRs, Ex A to 1-24-2024 discovery demands) (Shields, Elliot) (Entered: 05/20/2024)
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Thank you.

Victoria



Victoria S. Gleason

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

DAVID VANN,

Plaintiff,

-against-

CITY OF ROCHESTER, et al.,

18-CV-6464 (EAW)(MJP)

Defendants,

AMENDED NOTICE OF DEPOSITION PURSUANT TO FED. R. CIV. P. 30(b)(6)

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiff will take the depositions upon oral examination of the City of Rochester (“City”). Said deposition will commence on February 28, 2024 at 10:00 a.m. at the offices of Easton Thompson Kasperek Shiffrin LLP, The Powers Building, 16 West Main Street, Suite 243 Rochester, New York 14614, Rochester, New York; or by virtual means. The deposition(s) will be conducted before a notary public or other officer authorized to administer oaths and will be recorded by stenographic means. The deposition will additionally be recorded by video. The deposition(s) will be taken pursuant to the Federal Rules of Civil Procedure and will continue from day to day until completion.

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, the City must designate and fully prepare one or more officers, agents, employees, or other persons who consent to testify on its behalf about information known or reasonably available to the City concerning the Matters for Deposition set forth below.

At least seven (7) days in advance of any session of this deposition, the City shall identify to Plaintiff in writing the witness(es) who will testify at such session and the Matters for Deposition about which each such witness shall testify at such session. The City must produce

all documents pertaining to those of the Matters for Deposition about which each witness will testify, and which have not previously been produced, no later than seven (7) business days prior to the session at which such witness will testify.

MATTERS FOR DEPOSITION¹

1. The completeness of the documents and/or electronically stored data produced pursuant to Fed. R. Civ. P. 34.
2. All rules, regulations, methods, policies, procedures, and practices, in effect or customarily followed between January 1, 2010, and present regarding:
 - a. The RPD's use-of-force polices, memorandums/other written guidance, and training (including training materials).
 - b. The RPD's polices, memorandums/other written guidance, and training (including training materials) associated with de-escalation.
 - c. The use of pepper spray / OC spray.
 - d. The use of force against individuals who are handcuffed.
 - e. The RPD's documentation of use-of-force incidents, including the obligation of RPD officers to articulate the justification for their use of force.
 - f. Drafting paperwork related to a use of force incident, including charging documents (felony complaints, etc.), incident reports and subject resistance reports.
 - g. How the RPD uses data related to use of force incidents, including how data related to such incidents is posted on the agency's website, and the regularity and timeliness of such postings.
 - h. Conducting "neighborhood checks" / drafting depositions / documentation of witness interviews, review of video (including CCTV or security camera footage) and other investigative activities performed in connection with investigation of arrests and/or use of force incidents.
 - i. Testifying in criminal court proceedings and other legal proceedings, including all policies, training, supervision, and discipline to ensure that

¹ Plaintiff incorporates into these Matters for Deposition the definitions set forth in Plaintiff's First Consolidated Set of Interrogatories and Request for Production of Documents dated March 21, 2019.

officers do not present evidence that they know or should know is false or misleading.

- j. Collection of video evidence.
- k. Probable cause to arrest for Obstruction of Governmental Administration, Penal Law § 195.05.
- l. Probable cause to arrest for Trespass, Penal Law § 140.10.
- m. Probable cause to charge an arrestee with Assault in the Second Degree, PL § 120.05(3)
- n. Probable cause to charge an arrestee with assault in the third degree, PL § 120.00(2)
- o. Probable cause to charge an individual with Resisting arrest, Penal Law § 205.30.
- p. IA Pro and all other force monitoring systems and force monitoring policies of the City and the RPD.
- q. All early warning and tracking systems regarding the use of force by individual officers.
- r. Completion of the Grand Jury Referral and providing same to the District Attorney's Office.
- s. Policies regarding the obligation to disclose material favorable to the defense as set forth in *Brady v. Maryland*, 373 U.S. 83 (1963); *Giglio v. United States*, 450 U.S. 150 (1972), and their progeny.
- t. How the RPD collects / maintains *Giglio* and *Brady* materials related to misconduct of its officers, and how this information is disclosed to the District Attorney's Office.
- u. The City's review, investigatory and disciplinary processes with respect to use of force incidents, whether conducted by the Professional Standards Section or other members / units of the department.
- v. The City's review, investigatory and disciplinary processes with respect to allegations that officers were untruthful in providing statements in sworn paperwork or testimony provided under oath.

- i. Do officers automatically go on a *Brady* list (submitted to all prosecuting entities) if they are found to have provided untruthful statements in paperwork or testimony?
 - w. Review of incidents that result in criminal trials where the defendant is acquitted at trial.
 - x. Tracking and statistics of arrests and criminal prosecutions involving the following charges: assault on a police officer; resisting arrest; disorderly conduct; harassment; trespass; obstruction of governmental administration.
3. The complete PSS investigations involving any of the named defendants.
4. The complete PSS investigation of the following incidents:
- a. 2010-1217
 - b. 2011-1157
 - c. 2012-0568
 - d. 2012-0742
 - e. 2013-0641
 - f. 2013-0993
 - g. 2014-0243
 - h. 2014-0330
 - i. 2015-0394
5. All training, policies, and procedures provided to sergeants and other supervisors regarding review of videos and other evidence, to ensure that the allegations in officers' reports—including Incident Reports and Subject Resistance Reports—are complete and accurate.
6. All training provided by the City between September 2010 and September 2015 regarding dealing with individuals with mental health disorders, including but not limited to: schizoaffective disorder and bipolar disorder.

7. All training provided by the City between September 2010 and September 2015 regarding responding to and/or engaging with persons in mental health crisis.

8. All statistics and data compilations between 2010 – 2016 regarding the number citizen complaints and internal complaints concerning allegations that an officer used excessive force, and the final outcomes of such complaints (i.e., the number of complaints that were, “substantiated”, “unfounded”, “unprovable”, “exonerated”, or something else).

9. All statistics and data compilations regarding the number of citizen complaints and internal complaints investigated by the Professional Standards Section concerning allegations of misconduct *other than that the officer used excessive force*, and the outcomes of such complaints, between 2008 – 2016.

10. From September 4, 2011 to present, what does the Professional Standards Section do after it receives a Subject Resistance Report? What is the process of the Professional Standards Section for reviewing an incident after it receives a Subject Resistance Report?

11. From October 9, 2011 to June 30, 2016, whether the Professional Standards Section ever initiated an investigation solely based on its review of a Subject Resistance Report.

12. All training received by Matthew Drake, Steven Mitchell and Jeffrey Kester prior to September 4, 2015, regarding dealing with individuals with mental health disorders, including but not limited to behavioral health crisis, schizoaffective disorder, and bipolar disorder.

13. General Order 335, and the requirements for timely completing and submitting Subject Resistance Reports.

Dated: January 24, 2024
New York, New York

ROTH & ROTH LLP

By: _____ ~//s//~
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